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## MEMORANDUM ENDORSED

February 21, 2025

### VIA CM/ECF

Honorable Judge John G. Koeltl  
Daniel Patrick Moynahan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Duran v. JB Hunt Transport, Inc., et al.*; Case No. 1:23-CV-09707-JGK  
(S.D.N.Y.)**

Dear Judge Koeltl:

I represent Defendants JB Hunt Transport, Inc. and Roman Astave in the above-referenced matter. The Defendants, including co-Defendant Franklin Gonzalez, respectfully request a conference with the Court to discuss discovery issues that the parties have been unable to resolve requiring the Court's intervention.

Pursuant to the discovery schedule, we proceeded with Plaintiff's deposition on January 8, 2025, but were unable to complete Plaintiff's deposition at that time. The deposition took longer than expected in light of the fact that Plaintiff required a Spanish interpreter, and multiple questions had to be repeated and/or rephrased. It is also important to note that Counsel for co-defendant Franklin Gonzalez has not yet begun her questioning of plaintiff.

The parties were able to agree on a date to conduct a further deposition of Plaintiff. However, plaintiff's counsel has only agreed to produce his client for 2 hours and 5 minutes as he indicated the initial deposition ran from 11:08 am until 4:03 PM (4 hours and 55 minutes). Plaintiff's calculation does not take into account the multiple breaks and lunch break during this period of time, and that plaintiff required a Spanish interpreter for her deposition which necessarily causes additional delays in questioning.

Accordingly, Defendants, including co-Defendant Franklin Gonzalez, respectfully request an immediate conference with the Court to address the above discovery issue.


Respectfully submitted,

*Rachel Gruenberg*

To all parties via ECF

The Court recognizes that any ruling that permits further questioning of plaintiff will require her to miss a day of work to attend the deposition. But this hardship must be balanced against the legitimate discovery needs of the defendants. In light of the fact that plaintiff sued two defendants, and the resulting entitlement of two separate parties to conduct questioning of plaintiff, plaintiff shall make herself available for one more 7-hour day of questioning at the parties' earliest convenience.

So Ordered.

  
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GABRIEL W. CORENSTEIN  
United States Magistrate Judge  
February 25, 2025